

COURTS
COPY

United States Dist. Court
for the middle Dist. of Penna.

William R. Branch
Plaintiff

vs.

MR. RUSSIAN, et. al.,
Defendant

ORIGINAL

none to cr

Action No. 1: CV-00-1728

(Judge Conner)

FILED
HARRISBURG, PA

JAN 22 2004

MARY E. D'ANDREA
Per Deputy Clerk

Motion to Deny Summary Judgement
OR A Stay in Proceedings OR a Continuance

PER Rules of federal Rules of Civil Procedure *Rule 56(f), 26(a), 33(b)(3), 37.

if it's this most august court inmate CF-3756
William Branch Housed at Sciwaymart Prayes the
noble Judge Conner will Deny Defendants
motion for Summary Judgement. in that Pleadings
are not closed per court order Dated 1-7-04

as to genuine issue Defendants concede in
their BRIEF in Support of their motion for Summ-
ary Judgement, On Page 19, 20 that I have already
satisfied the first and Second Prongs of Rauser.

I can establish a causal link between my
Protected activities and the adverse actions that
Defendants acknowledge in their statement of undis-
puted material facts. all I need is Discovery in
my Supplemental Pleading, on the Court will see
a pattern based on the timing of misconducts to
deny Paroles as well as Retaliate against inmates

Who Report their misconducts
Date 1-16-04

Wm Branch CF-3756

There fore I ask that Summary
Judgement Be Denied

Per Box 256
Waymart Pa 18472

Motion To Deny Summary Judgement

Proof of Service

Ms Mosely esq
Strawberry Sq 15 FL
Harrisburg Pa. 17120

J. Conner
Po Box 983
Harrisburg Pa 17108

Verification

I affirm that the above is true under Penalty
of the Law

Date 1-16-04

William Branch CF3256
Po Box 256
Waymart Pa 18472